



U.S. Department of Justice
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January 22, 2025

Molly Dwyer, Clerk of Court
Office of the Clerk
U.S. Court of Appeals for the Ninth Circuit
San Francisco, CA 94119-3939

RE: *In re Nielsen v. Northern District of California*, No. 24-867

Dear Ms. Dwyer:

We respectfully submit this letter to update the Court on the status of settlement between the United States and plaintiffs in *Wilbur P.G. et al., v. United States*, No. 4:21-cv-04457 (N.D. Cal.), from which this mandamus petition arises. The settlement agreements have been executed. Plaintiffs dismissed their case on January 21, 2025, and the clerk of the court closed the case. The stipulation of dismissal is attached.

Sincerely,

s/ Catherine Padhi
Catherine Padhi

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2025, I electronically filed the foregoing letter with the Clerk of the Court by using the appellate ACMS system. Participants in the case are registered ACMS users, and service will be accomplished by the appellate ACMS system.

In addition, a copy of the foregoing document was provided to the District Court for the Northern District of California by email to Magistrate Judge Kandis A. Westmore's chambers, kawpo@cand.uscourts.gov.

s/ Catherine Padhi

Catherine Padhi

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[Additional Counsel on the following page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

WILBUR P. G.; WILFREDO BALTAZAR P.
E. a minor child; ERENDIRA C. M.;
YASMIN ALICIA M. C. a minor child;
JOSHUA G. G.; and KARL LUIS G. G.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

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Case No. 4:21-cv-04457-KAW

STIPULATION FOR DISMISSAL

Judge: Hon. Kandis A. Westmore

Date Filed: June 10, 2021

Trial Date: Stayed

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STIPULATION FOR DISMISSAL

Plaintiffs Wilbur P. G.; Wilfredo Baltazar P. E., a minor child; Erendira C. M.; Yasmin Alicia M. C., a minor child; Joshua G. G.; and Karl Luis G. G. (“Plaintiffs”) and Defendant United States of America (“Defendant”) (together, “Parties”), by and through their respective counsel of record, previously provided notice that they had agreed in principle to settle this matter. Dkt. 233. All conditions of the Parties’ settlement stipulations have now been satisfied, including the Court’s approval of the minor settlements, *see* Dkt. 246, and payment of settlement funds to the Plaintiffs. The Parties therefore stipulate to the dismissal with prejudice of all claims in this action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), with each party to bear their respective fees and costs.

Dated: January 21, 2025

KEKER, VAN NEST & PETERS LLP

By: /s/ Travis Silva

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Attorneys for Plaintiffs

Dated: January 21, 2025

LAWYERS’ COMMITTEE FOR CIVIL
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By: /s/ Jordan Wells

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Attorneys for Plaintiffs

1 Dated: January 21, 2025

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FOUNDATION OF NORTHERN
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3
4 By: /s/ Bree Bernwanger
BREE BERNWANGER

5 Attorneys for Plaintiffs

6 Dated: January 21, 2025

ISMAIL J. RAMSEY
UNITED STATES ATTORNEY

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8 By: /s/ Kelsey J. Helland
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Assistant United States Attorneys
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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: January 21, 2025

By: /s/ Travis Silva
Travis Silva